REMARKS

In response to the objection to Figure 11, a replacement sheet for Figure 11 is submitted herewith. Additionally, a marked-up copy of the replacement sheet for Figure 11 is submitted herewith as required by the Office Action. It should be noted that the "Annotated Marked-Up Drawings" contain no annotations as no changes were made to Figure 11 other than to improve copy machine clarity, thereby increasing the legibility of the figure. Withdrawal of the objection to Figure 11 is respectfully requested.

Claims 1-19 are pending in the present application and stand rejected. Claim 3 has been amended. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claim 3 is rejected under 35 U.S.C. § 112, second paragraph, under two bases. First, it is asserted that the limitation "degenerated thing" has insufficient antecedent basis. Claim 3 has been amended. Second, it is asserted that the term "degenerated," as used in claim 3, is indefinite because the "accepted meaning is 'breaking up or parsing the words.'" It is unclear where the Office Action has acquired such a definition; Applicants respectfully traverse the rejection in this regard. A definition of "degenerate" known to those skilled in the art is "being mathematically simpler than the typical case" (*e.g.*, a *degenerate* hyperbola). Notwithstanding the above, one skilled in the art would fully understand the meaning of "degenerated" as described in the specification from p. 22, line 1 to p. 23, line 9, which includes several, detailed examples of degeneration. Withdrawal of the rejections under 35 U.S.C. § 112, second paragraph, is respectfully requested.

Claims 1-19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Husick et al. (U.S. Patent No. 5,675,788) (hereinafter "Husick"). The rejections are respectfully traversed.

The Office Action relies on Fig. 1, #112 and col. 9, lines 15-20 of Husick as anticipating "*periodically circulating* a plurality of registered information sources to collect information," as claimed in claim 1. Fig, 1, #112 of Husick refers to various publisher sources from which information files are collected. Col. 9, lines 15-20 of Husick discloses a "data center 110" that stores the information files collected from the publisher sources. As clearly shown from the above, nothing in the recited portion of Husick discloses "*periodically circulating* a plurality of registered information sources to collect information," as claimed in claim 1.

The Office Action relies on Fig. 7 of Husick as anticipating "selecting words for topical elements *from the collected information*," as claimed in claim 1. To understand the argument provided by the Office Action, we must first assume, *arguendo*, that the Office Action is correct in arguing that the "information files" collected from the publisher sources in Husick anticipate the "collected information" of the presently claimed invention. Based on the above, it *should* logically follow that Fig. 7 of Husick "selects words for topical elements" from the information files. However, this is clearly not the case. Figure 7A, as described in col. 8, lines 11-12 of Husick, refers to a hidden Markov model suitable for parsing full sentences; Figure 7B, as described in col. 8, lines 13-14 of Husick refers to a hidden Markov model for parsing sentence fragments. The hidden Markov models are used for determining parts of speech *of natural language query terms* in a search engine (Husick, col. 23, lines 25-28). Nothing in the Fig. 7

discloses "selecting words for topical elements *from the collected information*," as claimed in claim 1.

The Office Action relies on Fig. 10 of <u>Husick</u> as anticipating "clustering *the selected set of words*," as claimed in claim 1. Once again, to understand the argument provided by the Office Action, we must first assume, *arguendo*, that the steps of "periodically circulating" and "selecting words," as claimed in claim 1, were anticipated as described by the Office Action. It was already described in greater detail above that the Office Action has failed to provide a logical link between the steps of "periodically circulating...*to collect information*" and "selecting words...*from the collected information*" in accordance with the language of claim 1. Thus, for purposes of simplicity, we will assume, *arguendo*, that the Office Action is correct in arguing that Fig. 7 of <u>Husick</u> anticipates the step of "selecting words," as claimed in claim 1.

Fig. 10 of <u>Husick</u> discloses an automatic docket subjecting system. That is, documents stored in the image/text database of <u>Husick</u> may be divided into a number of different subject categories. Now, it should clearly be apparent that Fig. 7 and Fig. 10 of <u>Husick</u> are entirely *unrelated*. Fig. 7 of <u>Husick</u> refers to a hidden Markov model for parsing parts of speech in a *search query*, whereas Fig. 10 of <u>Husick</u> refers to dividing documents *in a database* into subjects. Fig. 10 does not show clustering the parts of speech parsed from the search query, as is logically required to anticipate the step of "clustering," as argued by the Office Action.

The Office Action relies on a portion of the <u>Husick</u> background to anticipate "*based on the result of the clustering*, displaying information elements...and at the same time displaying main keywords," as essentially claimed in claim 1. Specifically, the
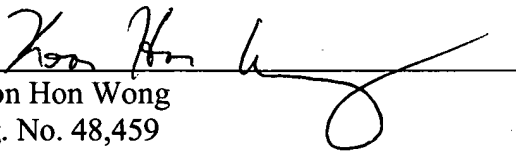
Office Action relies on various, unrelated portions of Husick, including col. 2, lines 5-20, col. 5, line 60-col. 6, line 5, Fig. 4A, col. 14, lines 40-50, and col. 4, lines 15-60. It is respectfully reminded, that the Office Action's own argument was that Fig. 10 anticipates the step of *"clustering,"* as claimed in claim 1. Thus, assuming the aforementioned argument is correct, it would logically follow that the steps of "displaying information elements" and "at the same time displaying main keywords," as claimed in claim 1, should begin from the results of Fig. 10 of Husick. However, the Office Action attempts to anticipate the recited limitations of claim 1 using unrelated portions of Husick while entirely avoiding its previous argument, and, accordingly, the results of Fig. 10.

It is respectfully asserted that the Office Action does not anticipate each *and* every limitation of claim 1, and thus, fails to establish *prima facie* anticipation. For example, the Office Action does not show the logical relation between the steps of claim 1, *e.g.*, "periodically circulating...*to collect information*"; "selecting words...*from the collected information*"; "clustering *the selected words*"; and "based *on the result of clustering,*" as essentially claimed in claim 1.

Accordingly, claim 1 believed to be patentably distinguishable over Husick. Independent claims 6, 8, 11, 14, 16, 18 and 19 are believed to be allowable for at least the reasons provided for claim 1. Dependent claims 2-5, 7, 9-10, 12-13, 15 and 17 are believed to be allowable for at least the reasons at least the reasons given for the independent claims. Withdrawal of the rejection of claims 1-19 under 35 U.S.C. §102(b) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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Annotated Marked-up Drawing

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Fig. 11